

McMANIMON, SCOTLAND & BAUMANN, LLC

75 Livingston Avenue, Suite 201

Roseland, New Jersey 07068

(973) 622-1800

Anthony Sodono, III (asodono@msbnj.com)

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Attorneys for Anthony Sodono, III, Temporary Receiver

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

THEFBAMACHINE, *et al.*,

Defendants.

Civil Action No. 24-6635 (JXN)(LDW)

Return Date: October 7, 2024

**CERTIFICATION OF SARI B. PLACONA, ESQ., IN SUPPORT OF MOTION TO
APPROVE INTERIM FEES AND EXPENSES THROUGH JULY 31, 2024, TO
McMANIMON, SCOTLAND & BAUMANN, LLC, COUNSEL TO TEMPORARY
RECEIVER**

SARI B. PLACONA, ESQ., of full age, hereby declares under penalty of perjury, as follows:

1. I am an attorney at law of the States of New Jersey and New York and a partner with the firm of McManimon, Scotland & Baumann, LLC (“MS&B”).

2. By order dated June 18, 2024, the Court approved the retention of MS&B as counsel to Anthony Sodono, III, Temporary Receiver for TheFBAMachine, Inc. (“FBA”); Passive Scaling Inc. (“Passive”); Sales.Support New Jersey Inc. (“Sales.Support”); 1HR Deliveries Inc. (“1HR”); Hourly Relief Inc. (“Hourly”); 3PL Logistic Automation Inc. (“3PL”); FBA Support NJ Corp. (“FBA Support”)’ Daily Distro, LLC (“Daily Distro”); Closter Green

Corp. d/b/a Wraith & Co. (“Wraith”) (where appropriate, FBA, Passive, Sales.Support, 1HR, Hourly, 3PL, FBA Support, Daily Distro, and Wraith will be collectively referred to as the “Receivership Entities”) and Bratislav Rozenfeld a/k/a Steven Rozenfeld a/k/a Steven Rozen, individually and as an officer or owner of the Receivership Entities, or any of them (“Rozenfeld”). A copy of such order is attached as **Exhibit A**. [Document 26]

3. I make this certification in support of an allowance of fees and reimbursement of expenses for the period through July 31, 2024 (the “Fee Period”).

4. MS&B shows that annexed as **Exhibit B** is its inhouse computer printouts itemizing all services performed during the Fee Period. As shown on such exhibit, MS&B has devoted 334.60 hours during the Fee Period, having a value of \$148,624.00.

9. MS&B further shows that also as reflected on annexed **Exhibit B**, it has incurred out-of-pocket expenses in the total amount of \$2,915.26 during the Fee Period.

10. During the Fee Period, MS&B performed a wide variety of legal services in connection with this matter during the Fee Period including, but not limited to, the following:

- (a) Advised the Temporary Receiver with respect to his powers and duties;
- (b) assisted the Temporary Receiver to conserve, hold, and manage receivership assets and perform acts necessary or advisable to preserve the value of those assets in order to prevent any irreparable loss, damage, or injury to consumers including, but not limited to, obtaining an accounting of the assets and preventing the transfer, withdrawal, or misapplication of assets;
- (c) traveled to and visited multiple locations around New Jersey with Receiver and Plaintiff to meet with Defendants’ employees and inspect/explore premises;
- (d) reviewed Plaintiff’s initial moving papers including complaint and supporting exhibits (47);
- (e) attended and participated in court hearings;
- (f) multiple daily communications with Plaintiff and counsel to Defendants (the “Parties”);

(g) conferred with Plaintiff and Temporary Receiver in connection with pending proceedings and litigations in various states and jurisdictions;

(h) conferred with Temporary Receiver in connection with access and control of accounts and websites maintained by the Defendants;

(i) attended and participated in multiple calls with the former and current employees, customers, and their counsel regardsing the TRO, discovery, and information;

(j) communicated with Plaintiff regarding insurance, accessing accounts, financials, websites, general operations, and continuation of business;

(k) communicated with the Temporary Receiver in connection with regulatory and other proceedings pending in Florida and New Jersey;

(l) communicated with GoDaddy in connection with Defendants' websites;

(m) coordinated with IT personnel regarding Defendants' websites and establishing website for Temporary Receiver;

(n) communicated with Temporary Receiver and Amazon in connection with shutting down website, TRO support, and account information;

(o) reviewed multiple court filings including, but not limited to, extensions of the TRO, certification and entry of Receiver's bond, Plaintiff's amended complaint, and motion to lift temporary seal;

(p) reviewed and monitored former and current employee and customer complaints;

(q) regularly communicated with Defendants' customers regarding complaints, claims, and order fulfillment;

(r) communicated with Defendants' employees and coordinated services for continued operation at the North Bergen warehouse to fulfill orders and empty warehouse;

(s) communicated with Defendants' landlords;

(t) communicated with banks and financial institutions regarding levies, release, and Temporary Receiver EIN number and access;

(u) addressed Defendants' violations of the TRO and drafted and subpoenas;

(v) prepared and filed Temporary Receiver's Report;

(w) drafted application for fees of counsel and accountants; and

(x) performed such other legal services for the Temporary Receiver as necessary and appropriate.

11. To the best of my knowledge, information, and belief, all fees and expenses requested in the attached billing statements are true and correct.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements is willfully false, I am subject to punishment.

Dated: August 27, 2024

/s/ Sari B. Placona

SARI B. PLACONA

EXHIBIT A

McMANIMON, SCOTLAND & BAUMANN, LLC

75 Livingston Avenue, Suite 201

Roseland, New Jersey 07068

(973) 622-1800

Anthony Sodono, III, Esq. (asodono@msbnj.com)

Michele Dudas, Esq. (mdudas@msbnj.com)

Sari B. Placona, Esq. (splacona@msbnj.com)

Attorneys for Anthony Sodono, III, Receiver

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

THEFBAMACHINE INC., a corporation;

PASSIVE SCALING INC., a corporation;

SALES.SUPPORT NEW JERSEY INC., a
corporation;

1HR DELIVERIES INC., a corporation;

HOURLY RELIEF INC., a corporation;

3PL LOGISTIC AUTOMATION INC., a
corporation;

FBA SUPPORT NJ CORP., a corporation;

DAILY DISTRO LLC, a limited liability
company;

CLOSTER GREEN CORP., doing business as
WRAITH & CO., a corporation; and

BRATISLAV ROZENFELD, also known as
Steven Rozenfeld and Steven Rozen,
individually and as an officer or owner of
THEFBAMACHINE INC., PASSIVE
SCALING INC., SALES.SUPPORT NEW
JERSEY INC., 1HR DELIVERIES INC.,

Civil Action No. 24-6635 (JXN) (LDW)

**ORDER AUTHORIZING RECEIVER
TO RETAIN (I) MCMANIMON,
SCOTLAND & BAUMANN, LLC AS
ATTORNEYS FOR THE RECEIVER;
AND (II) EISNER ADVISORY GROUP
LLC AS ACCOUNTANTS TO THE
RECEIVER**

HOURLY RELIEF INC., 3PL LOGISTIC
AUTOMATION INC., FBA SUPPORT NJ
CORP., DAILY DISTRO LLC, and CLOSTER
GREEN CORP., doing business as WRAITH &
CO., a corporation,

Defendants.

THIS MATTER having been opened to the Court by Anthony Sodono, III, Temporary Receiver (“Receiver”) for The FBA Machine Inc., Passive Scaling Inc., Sales.Support New Jersey Inc., 1HR Deliveries Inc., Hourly Relief Inc., 3PL Logistics Automation Inc., FBA Support NJ Corp., Daily Distro LLC, and Closter Green Corp d/b/a Wraith & Co. and Bratislav Rozen a.k.a. Steven Rozenfeld and Steven Rozen, individually and as an officer of The FBA Machine Inc., Passive Scaling Inc., Sales.Support New Jersey Inc., 1HR Deliveries Inc., Hourly Relief Inc., 3PL Logistics Automation Inc., FBA Support NJ Corp., Daily Distro LLC, and Closter Green Corp d/b/a Wraith & Co. (the “Receivership Entities”), upon the supporting Application of Receiver and Certification of professionals, seeking the order authorizing the Receiver to retain (i) McManimon, Scotland & Baumann, LLC (“MSB”), as counsel to the Receiver; and (ii) Eisner Advisory Group LLC (“Eisner”), as accountants to the Receiver; and it appearing that: (i) MSB and Eisner do not represent or hold any adverse interest with respect to the matters upon which they are to be retained; (ii) MSB and Eisner claim no interest in the suit or any of the parties thereto in any way which would disqualify it from serving the Receiver in good faith as a fiduciary for all of the beneficial owners and creditors of the estate, as contemplated by L. Civ. R. 66.1(g) of the Local Civil Rules of the United States District Court for the District of New Jersey; and (iii) the employment of MSB and Eisner is appropriate and necessary; and proper notice of the application and certifications and proposed entry hereof having been given; and sufficient cause having been shown;

IT IS on this 18th day of June 2024;

ORDERED that the Receiver be and hereby is authorized to employ, effective as of June 3, 2024, MSB as counsel herein; and it is further

ORDERED that the Receiver be and hereby is authorized to employ Eisner Advisory Group LLC as his accountant herein; and it is further

ORDERED that compensation to MSB and Eisner Advisory Group LLC for services rendered and expenses incurred shall be pursuant to appropriate applications to be submitted and approved by this Court pursuant to L. Civ. R. 66.1(h) of the Local Civil Rules of the United States District Court for the District of New Jersey.



JULIAN XAVIER NEALS
United States District Judge

EXHIBIT B



McMANIMON • SCOTLAND • BAUMANN

75 Livingston Avenue, Roseland, NJ 07068 (973) 622-1800

August 27, 2024

FTC
Bureau of Consumer Prot./Div. Marketing
Practices
BCP/DMP/CC-6316
600 Pennsylvania Avenue, NW
Washington, DC 20580

Invoice #: 228948
Client #: 29562
Matter #: 1
Billing Attorney: AS1

INVOICE SUMMARY

For Professional Services Rendered Through July 31, 2024.

RE: A. Sodono, Receiver

Total Professional Services	\$ 148,624.00
Total Disbursements	<u>\$ 2,915.26</u>
TOTAL THIS INVOICE	\$ 151,539.26

PROFESSIONAL SERVICES

Date	Atty	Description	Hours	Amount
5/01/24	AS1	Call with Fran Kern and Colleen Robinson re: receivership	.20	111.20
5/07/24	AS1	Call with F. Kern and C. Robbins to discuss receivership	.60	333.60
5/16/24	AS1	Analyze orders from prior hearings	.50	278.00
5/21/24	AS1	Communicate with FTC re: addendum to CV	.30	166.80
5/29/24	AS1	Call with Colleen Robbins, Fran Kern, and FTC Investigators re: status and strategy	1.10	611.60
5/29/24	DP	Conference call with FTC (Colleen Robbins, Fran Kern, and 2 investigators), Anthony Sodono, III, and Sari B. Placona re: status/strategy	1.10	220.00
5/29/24	DP	Prepare outline of 5/29/2024 call; circulate amongst MSB team	.30	60.00
5/29/24	MMD	Introductory call with FTC and Receiver	1.00	440.00
5/29/24	SBP	Call with A Sodono, M Dudas, D Perrotta, and FTC re: case	1.00	420.00
6/03/24	AS1	Analyze temporary freeze/restraining order and supporting pleadings and brief; discuss with MSB team	1.70	945.20
6/03/24	AS1	Call with F. Kern and C. Robbins re: freeze order and operations	.30	166.80
6/03/24	AS1	Analyze pleadings--order granting ex parte relief, declaration of Tyler Broome, order sealing, complaint, asset freeze, memorandum of law, exhibits; analyze issues; draft outline of strategy	3.90	2,168.40
6/03/24	MMD	Call with counsel to FTC, A. Sodono and S. Placona re: Order to Show Cause	.20	88.00
6/03/24	MMD	Begin review of OSC and related pleadings	2.60	1,144.00
6/03/24	SBP	Call with A. Sodono, M. Dudas, and FTC re: order	.20	84.00
6/03/24	SBP	Review complaint, TRO, and pleadings	1.30	546.00
6/04/24	MK	Attended meeting with FTC regarding case details and steps for moving forward.	2.50	380.00
6/04/24	MK	Began drafting Retention pleadings for Accountants and Counsel to Receiver. Shared and confirmed that all files were saved and accessible for all parties involved.	1.10	167.20
6/04/24	AS1	Call with FTC representatives, Michele M. Dudas, and Sari B. Placona re: Freehold property	.60	333.60
6/04/24	AS1	Meeting with F. Kern, C. Robbins, and R. Tyndall from FTC, Michele M. Dudas, Sari B. Placona, and A. Calasciabetta re: background and actions to be taken in District Court litigation	2.50	1,390.00
6/04/24	AS1	Continue reviewing/analyzing order granting ex parte relief, declaration of Tyler Broome, order sealing, complaint, asset freeze, memorandum of law, exhibits; analyze and draft outline of strategy	2.70	1,501.20
6/04/24	AS1	Communicate with Mr. Rozenfeld re: issues	.30	166.80
6/04/24	AS1	Communicate with Lobosco re: bond	.20	111.20
6/04/24	AS1	Call with Howell and Freehold Police Departments	.20	111.20



Date	Atty	Description	Hours	Amount
6/04/24	AS1	Call with F. Kern, C. Robbins, Michele M. Dudas, and Sari B. Placona re: warehouse, license issues	.30	166.80
6/04/24	AS1	Call with F. Kern, C. Robbins, Michele M. Dudas, and Sari B. Placona re: N. Bergen warehouse	.50	278.00
6/04/24	AS1	Review R. Tyndall email re: asset freeze	.10	55.60
6/04/24	AS1	Draft letter to Court re: freezing assets	.20	111.20
6/04/24	AS1	Review R. Tyndall email re: CA inventory	.20	111.20
6/04/24	AS1	Communicate with Kehe/supplier re: delivery of goods, products, and distribution	.30	166.80
6/04/24	IDF	Review the memos AS3 sent over re: FBA machine x FTC	.40	80.00
6/04/24	IDF	Call/meeting re: FTC/FBA Machine matter	2.70	540.00
6/04/24	IDF	Drafting stay letters, reviewed edits, updated docs, submitted to AS3 and Sari Placona for final review.	2.40	480.00
6/04/24	MMD	Meeting with F. Kern, C. Robbins and R. Tyndall from FTC, A. Calascibetta, A. Sodono and S. Placona re: background and actions to be taken in District Court Litigation	2.50	1,100.00
6/04/24	MMD	Review additional background information and pleadings relating to Defendants; conduct Accurant searches; review updates to service of asset freeze notices and additional actions to be taken	1.90	836.00
6/04/24	MMD	Call with representatives of FTC, Receiver and S. Placona re: Freehold property	.60	264.00
6/04/24	SBP	Email A. Lobosco re: bond	.10	42.00
6/04/24	SBP	Call with FTC, A. Sodono, and M. Dudas re: Freehold location	.70	294.00
6/04/24	SBP	Travel to 1 Industrial Court; visit premises; return travel to home	1.20	504.00
6/04/24	SBP	Meeting with FTC, A. Sodono, M. Dudas, C. Gallo, I. Fisher, and M. Kelly	2.60	1,092.00
6/05/24	MK	Finished drafting Retention Pleadings for Accountants and Counsel to Receiver.	.60	91.20
6/05/24	AS1	Travel to/from North Bergen, NJ	1.20	667.20
6/05/24	AS1	Meet at 2011 8th Avenue with FTC representatives, Michele M. Dudas, and Defendants' employees; meet with F. DiPaolo re door replacement and securing assets; call with Michele M. Dudas and S. Rozenfeld; follow-up call with Michael Usher, counsel; email and calls with landlord; meet with representative of property management company	5.90	3,280.40
6/05/24	AS1	Call with Michele M. Dudas and Sari B. Placona re: actions to be taken; review multiple emails from FTC re: same and Lis Pendens	.60	333.60
6/05/24	AS1	Meeting with Michele M. Dudas to discuss FTC issues, Go Daddy, websites, tracking, products, inventory issues	.60	333.60
6/05/24	AS1	Multiple calls and emails with FTC re: various issues/operationally and information, computers	.70	389.20
6/05/24	AS1	Communicate with Michele M. Dudas re: securing computers, other electronic devices; email to counsel re "text message"	.20	111.20
6/05/24	AS1	Travel to/from Morristown, NJ, to Miami, FL, to meet with Mr. Rozenfeld	6.90	3,836.40

Date	Atty	Description	Hours	Amount
6/05/24	AS1	Review R. Tynall email re: high level and production	.10	55.60
6/05/24	AS1	Communicate with Reeve Y. re: inspection of Rozenfeld-office	.20	111.20
6/05/24	IDF	Search for judges in NJ/FL jurisdictions, found court addresses, edited stay letters, created chart overviewing disposition status of the litigations.	.90	180.00
6/05/24	MMD	Draft e-mail to counsel to Defendants re: June 6 meeting	.20	88.00
6/05/24	MMD	Meet at 2011 8th Avenue, North Bergen with Receiver, representatives of FTC, employees of the Defendants; meet with F. DiPaolo re: door replacement and securing assets; call with Temporary Receiver and Steven Rozenfeld and follow up call with Michael Usher, counsel; e-mail and calls with landlord; meet with representative of property management company; meet at Anpesil property; call with various e-mails updating status	6.80	2,992.00
6/05/24	MMD	Travel to and from North Bergen, New Jersey	1.20	528.00
6/05/24	MMD	Review e-mail from counsel to GoHighLevel and draft response	.10	44.00
6/05/24	MMD	Follow up call with A. Sodono and S. Placona re: actions to be taken; review various e-mails from the FTC re: same, including filing of Lis Pendens	.60	264.00
6/05/24	SBP	Review letter to GoDaddy re: TRO	.10	42.00
6/05/24	SBP	Review TD Bank response letter	.10	42.00
6/05/24	SBP	Travel to/from Freehold location to meet FTC; visit location and speak with Mr. Binder	2.60	1,092.00
6/05/24	SBP	Communicate with M. Pizzano re: bond	.10	42.00
6/05/24	SBP	Call with M. Dudas and A. Sodono re: locations and equipment	.40	168.00
6/05/24	SBP	Call with Tony Calascibetta re: books	.10	42.00
6/05/24	SBP	Review forensic accounting and distribution tracker	.20	84.00
6/06/24	AS1	Communicate with Sari B. Placona and Michele M. Dudas re: broker Corrigan and Dover Road property	.20	111.20
6/06/24	AS1	Discuss Freehold location and storage with Sari B. Placona	.20	111.20
6/06/24	AS1	Communicate with N. Bergen landlord re: rent	.20	111.20
6/06/24	AS1	Review Tyndall server issues, contacts	.20	111.20
6/06/24	AS1	Review Tyndall email email re: FBA support Kearny	.20	111.20
6/06/24	AS1	Analyze email from R. Tyndall to Google re: notice	.20	111.20
6/06/24	AS1	Review emails with GoDaddy; discuss with Michele M. Dudas	.20	111.20
6/06/24	AS1	Analyze FBAMachine Act. dis tracker	.20	111.20
6/06/24	AS1	Travel from Sheraton (Miami) to Biscayne Bay office to interview Mr. Rozenfeld	.70	389.20
6/06/24	AS1	Interview Mr. Rozenfeld	4.10	2,279.60
6/06/24	AS1	Travel from Miami to Newark Airport and from Newark Airport to Morristown	5.90	3,280.40
6/06/24	IDF	Review and updated stay letters and edited letters accordingly	.70	140.00

Date	Atty	Description	Hours	Amount
6/06/24	MMD	Meet Colleen Robbins, Fran Kern, Reeve Tyndall and Richard Kaplan at Eighth Street property; call with Bill Stiber, former employee, and draft memo summarizing conversation; coordinate turnover of passwords and access to accounts; various conversations with A. Sodono to discuss information provided by Defendant Rozenfeld	6.30	2,772.00
6/06/24	MMD	Draft memorandum respecting access to Anpesil, North Bergen property	.20	88.00
6/06/24	MMD	Call with Temporary Receiver prior to his meeting with Rozenfeld to address issues to be discussed and information obtained	.40	176.00
6/06/24	MMD	Draft e-mail regarding G-Suite options and access for employees	.20	88.00
6/06/24	MMD	E-mails to/from counsel to GoHighLevel re: preservation of accounts	.10	44.00
6/06/24	MMD	Travel to and from North Bergen warehouse	1.20	528.00
6/06/24	MMD	Various calls and e-mails with Temporary Receiver regarding open issues to be addressed	.30	132.00
6/06/24	SBP	Revise subpoena to Amex	.20	84.00
6/06/24	SBP	Calls with A. Sodono and M. Dudas re: meeting with target and computers	.30	126.00
6/06/24	SBP	Revise retention application	.80	336.00
6/06/24	SBP	Revise stay letters to courts re: underlying litigation	.60	252.00
6/06/24	SBP	Revise Amex subpoena	.10	42.00
6/06/24	SLL	Prepare subpoena to American Express	.30	60.00
6/07/24	AS1	Communicate with S. Rozenfeld re: Quickbooks and information; discuss with Michele M. Dudas	.40	222.40
6/07/24	AS1	Communicate with Patel FTC re: GoDaddy, Gohightlever, Quickbooks, online access	.20	111.20
6/07/24	BBC	Researched - Florida lis pendens; communicate with team.	1.60	243.20
6/07/24	MMD	Various e-mails and communications to coordinate the return of Rozenfeld laptop after imaging by FTC	.40	176.00
6/07/24	MMD	Coordinate access to additional login credentials	.20	88.00
6/07/24	MMD	Various calls and e-mails with Temporary Receiver re: open issues and actions to be taken	.40	176.00
6/07/24	MMD	Follow up call with F. Kern and C. Robbins re: Lis Pendens; relay information to Temporary Receiver	.20	88.00
6/07/24	MMD	Participate in call with F. Kern, C. Robbins, R. Tyndall, A. Sodono and S. Placona re: status and actions to be taken	1.20	528.00
6/07/24	MMD	Draft memo re: outline of notes from North Bergen meeting on June 5, 2024; provide to Temporary Receiver	.80	352.00
6/07/24	MMD	E-mails to/from counsel to GoHighLevel; e-mails to FTC imaging team re: access to same	.20	88.00
6/07/24	SBP	Zoom call with FTC, M. Dudas, and A. Sodono	1.10	462.00
6/07/24	SBP	Review TRO as to Rozenfeld's assets	.30	126.00
6/07/24	SBP	Revise Amex subpoena	.10	42.00
6/07/24	SLL	File stay letters in various litigation cases	.30	60.00



Date	Atty	Description	Hours	Amount
6/08/24	AS1	Analyze multiple emails with C. Robbins, F. Kern, Michele M. Dudas, and R. Kaplan re: passwords, usernames, go level	.40	222.40
6/08/24	AS1	Communicate with B. Chillemi re: lis pendens; communicate with Florida counsel, G. Moses	.20	111.20
6/08/24	AS1	Communicate with Amazon re: law enforcement request	.20	111.20
6/08/24	MMD	Various e-mails to/from Temporary Receiver regarding return of laptop and request for additional login information from S. Rozenfeld	.20	88.00
6/08/24	MMD	Review various e-mails regarding logins and account access; coordinate with Temporary Receiver for additional login information	.30	132.00
6/09/24	AS1	Draft report summary of issues and meeting with N. Bergen employees and S. Rozenfeld	1.10	611.60
6/10/24	AS1	Review and analyze retention application; discuss with Sari B. Placona	.30	166.80
6/10/24	AS1	Call with Michele M. Dudas re: filing lis pendens	.20	111.20
6/10/24	AS1	Call with F. Kern, C. Robbins, and R. Tyndall re: status	.30	166.80
6/10/24	BBC	Email exchange re: Lis Pendens.	.20	30.40
6/10/24	MMD	E-mails to/from Receiver re: North Bergen property, laptops and Lis Pendens; discuss issues regarding North Bergen property	.70	308.00
6/10/24	MMD	Review additional actions to be taken, including interviews of customers; discuss with A. Sodono	.60	264.00
6/10/24	MMD	Follow up status call with FTC, A. Sodono and S. Placona re: status	.80	352.00
6/10/24	MMD	Review various e-mails regarding additional assets/frozen identified by FTC; provide login information for sales.support	.20	88.00
6/10/24	SBP	Zoom call with A. Sodono, M. Dudas, and FTC re: status	.90	378.00
6/10/24	SBP	Review emails from FTC re: status of accounts	.20	84.00
6/10/24	SBP	Emails re: accounts and passwords	.20	84.00
6/11/24	AS1	Communicate and several email exchanges with Mr. Rozenfeld, Michele M. Dudas, and Sari B. Placona re: information required per the TRO	.80	444.80
6/11/24	AS1	Communicate with FTC email re: consumers, Metz carrier issues	.30	166.80
6/11/24	AS1	Communicate with A. Calascibetta re: Quickbooks download, strategy and status, forensic analysis	.40	222.40
6/11/24	AS1	Call with F. Kern, C. Robbins, Michele M. Dudas, and Sari B. Placona re: various outstanding issues	.80	444.80
6/11/24	MMD	Call with Devante Bond, customer re: whether orders will resume and related information; draft memorandum respecting conversation	.20	88.00
6/11/24	MMD	Call with Michelle Rodriguez, former employee re: past due pay and whether she will resume work; relay information to Temporary Receiver	.20	88.00
6/11/24	MMD	Call with Colleen Powers, counsel to Go High Level re: response to TRO; document information in memorandum and provide to FTC and Temporary Receiver	.20	88.00
6/11/24	MMD	Call with C. Robbins, counsel to FTC re: feedback from customers and related issues; relay information to Temporary Receiver	.30	132.00



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Date	Atty	Description	Hours	Amount
6/11/24	MMD	Confer with Temporary Receiver re: whether to continue operations to fulfill orders at North Bergen plant, and related information	.30	132.00
6/11/24	MMD	Review Financial Statement produced by Rozenfeld, individually; provide comments to Temporary Receiver	.20	88.00
6/11/24	MMD	Review various e-mails regarding adjournment of June 17, 2024 preliminary injunction hearing; begin review proposed Restraining Order; discuss issues with A. Sodono, including submission of Receiver's Report	.80	352.00
6/11/24	SBP	Email with C. Robbins re: consumer complaint	.10	42.00
6/11/24	SBP	Review Derendist statements	.20	84.00
6/11/24	SBP	Review updated tracker and documents from FTC	.30	126.00
6/11/24	SBP	Review emails re: consumers and orders	.20	84.00
6/11/24	SBP	Draft email to S Rozenfeld's attorney re: non-compliance with TRO; review deadlines	.50	210.00
6/12/24	AS1	Review Youtube videos "King of Amazon"	.50	278.00
6/12/24	AS1	Review M. Ramirez comments; communicate with D. Bond re: Sunshine	.40	222.40
6/12/24	AS1	Communicate with S. Rozenfeld re: budget	.20	111.20
6/12/24	AS1	Call with Michele M. Dudas and customers	.50	278.00
6/12/24	AS1	Call with Michele M. Dudas re: operations	.20	111.20
6/12/24	AS1	Call with Kenny Craig re: complaints	.30	166.80
6/12/24	AS1	Call with M. Chrystal re: complaints	.30	166.80
6/12/24	AS1	Call with Amazon re: shutting down site	.30	166.80
6/12/24	AS1	Call with Michele M. Dudas, F. Kern, and C. Robbins re: customer calls and information	.30	166.80
6/12/24	AS1	Call with C. Robbins re: FBAMachine charges	.20	111.20
6/12/24	AS1	Call with Antonio Carabello re: claims	.30	166.80
6/12/24	AS1	Communicate with Stephen Myer re: Valiant FBA support	.20	111.20
6/12/24	AS1	Communicate with Michele M. Dudas and Sari B. Placona re: strategy, customer complaints, financials (several calls/emails)	.70	389.20
6/12/24	AS1	Review email with Usher and discuss with Michele M. Dudas and Sari B. Placona	.20	111.20
6/12/24	AS1	Communicate with C. Robbins, F. Kern, R. Tyndall, Michele M. Dudas, and Sari B. Placona re: customer issues, PI hearing, Amazon	.70	389.20
6/12/24	AS1	Call with J. Deren re: customer FCA, with Michele M. Dudas and Sari B. Placona re: business relationship, issues, complaints	.60	333.60
6/12/24	AS1	Communicate with Michele M. Dudas and Sari B. Placona re: additional informational documents from S. Rozenfeld-corporate financials	.20	111.20
6/12/24	MMD	Call with James Deren, customer of FBA, A. Sodono and S. Placona regarding background and information; document memo of conversation	.60	264.00
6/12/24	MMD	E-mail to Amazon re: call regarding account information; review Affidavit submitted by Amazon in support of TRO; participate in call with Amazon	.80	352.00



Date	Atty	Description	Hours	Amount
6/12/24	MMD	Various calls and e-mails with Temporary Receiver re: actions to be taken	.70	308.00
6/12/24	MMD	E-mail to Devante Bond, customer, re: request for order information	.10	44.00
6/12/24	MMD	Review document production by GoHighLevel	.30	132.00
6/12/24	MMD	Forward Financial Statement completed by Rozenfeld to FTC; e-mails to/from Temporary Receiver regarding additional information that is outstanding (backup, corporate financial statement, etc.)	.20	88.00
6/12/24	MMD	Call with M. Crystal and A. Sodono re: background on Debtor and business; document conversation in memo; compare with information provided by FTC	.70	308.00
6/12/24	MMD	Call with Antonio Carabello, Luke Rotta, Brian Skuja and Bryce Wilbanks re: information relating to online stores; draft memorandum documenting each call; send out e-mails to B. Skuja and L. Rotta for information; relay information to Temporary Receiver; leave messages for other customers of FBA Machine	2.80	1,232.00
6/12/24	MMD	Call with C. Robbins, F. Kern, R. Tyndall, A. Sodono and S. Placona re: customer issues, PI hearing and Amazon	.70	308.00
6/12/24	MMD	Review and comment on proposed Stipulated Motion adjourning PI hearing	.10	44.00
6/12/24	MMD	Review settlement e-mail from M. Usher and proposed timeline	.10	44.00
6/12/24	MMD	Calls to and from Chase re: information to respond to TRO and request for time to respond	.20	88.00
6/12/24	SBP	Review Rozenfeld financial statement	.10	42.00
6/12/24	SBP	Call with FTC, M. Dudas and A. Sodono re: Amazon	.60	252.00
6/12/24	SBP	Review emails re: consumers	.30	126.00
6/12/24	SBP	Call with J. Deren and M. Dudas re: status of account	.50	210.00
6/12/24	SBP	Revise retention application for MSB and Eisner	.30	126.00
6/12/24	SBP	Review proposed preliminary injunction	.20	84.00
6/13/24	MK	Communicate with Court and efile retention pleadings	.60	91.20
6/13/24	MK	Drafted Bond entry pleadings for Receiver.	.90	136.80
6/13/24	AS1	Communicate with S. Rozenfeld re: financials re: Chase account	.20	111.20
6/13/24	AS1	Analyze financials and discuss with Michele M. Dudas and A. Calasciabetta	.80	444.80
6/13/24	AS1	Call with Michele M. Dudas, James Deren, R. Fernandez, and M. Crystal re: FBAMachine	1.20	667.20
6/13/24	AS1	Communicate with James Lahoe, Luke Rota, and A. Caraballo	.20	111.20
6/13/24	AS1	Review FTC extension pleadings; discuss with Michele M. Dudas	.30	166.80
6/13/24	AS1	Analyze retention application	.40	222.40
6/13/24	AS1	Call with M. Ramirez and Michele M. Dudas re: operations and funding fees	.30	166.80
6/13/24	AS1	Communicate with Skuja re: operations and complaints ("Ponzi Scheme")	.30	166.80



Date	Atty	Description	Hours	Amount
6/13/24	AS1	Review customer restriction letter; discuss with Michele M. Dudas	.30	166.80
6/13/24	AS1	Review bond certification	.20	111.20
6/13/24	AS1	Review J. Maghan letter re: Passive Scaling	.20	111.20
6/13/24	AS1	Telephone call to F. DiPaolo re: securing facility, locking up items	.30	166.80
6/13/24	MMD	Review e-mails re: revised version of motion to lift seal and review e-mail from FTC to Court re: same; review e-mail re: motion to extend TRO and e-mail to Court re: same; discuss dates with Temporary Receiver and respond	.20	88.00
6/13/24	MMD	Call with B. Skuja and Temporary Receiver re: FBA customer store; draft memorandum respecting conversation	.50	220.00
6/13/24	MMD	Review login information for Chase Bank accounts; e-mail to FTC re: same; begin downloading all statements; follow up call with Chase Subpoena Unit re: response to Subpoena	.80	352.00
6/13/24	MMD	Call with Richard Fernandez, FBA customer; draft memorandum regarding notes from conversation;	.70	308.00
6/13/24	MMD	Call with Colleen Powers re: access to Go High Level; e-mail to FTC Digital Imaging Unit re: same; relay information to C. Powers	.20	88.00
6/13/24	MMD	Calls with Temporary Receiver re: information obtained from customers, issues respecting reopening of business and information obtained from S. Rozenfeld	.50	220.00
6/13/24	MMD	Call with Temporary Receiver and F. DiPaolo re: monitoring and accessing property; travel to and from Wayne, New Jersey and meet with F. DiPaolo re: keys and actions to be taken	1.00	440.00
6/13/24	MMD	Call with M. Ramirez and Temporary Receiver re: FBA store and related issues; draft memorandum documenting conversation	.50	220.00
6/13/24	MMD	Call with Christopher Koo and Temporary Receiver; draft memorandum respecting conversation	.50	220.00
6/13/24	SBP	Review email from Usher re: TRO	.10	42.00
6/13/24	SBP	Communicate with A. Lobosco re: bond	.10	42.00
6/13/24	SBP	Review letter from B. Saldutti in Genes v Passive Scaling matter	.10	42.00
6/13/24	SBP	Communicate with court and parties re: Wegener litigation	.10	42.00
6/13/24	SBP	Review High Level Declaration	.20	84.00
6/13/24	SBP	Review letter from L. Nejes re: Monaghan suit and review amended complaint	.20	84.00
6/13/24	SBP	Review financials and Attachment A from Rozenfeld	.30	126.00
6/14/24	MK	Prepare and File Certification of Service of Retention Pleadings.	.40	60.80
6/14/24	AS1	Review motion to lift temporary seal	.20	111.20
6/14/24	AS1	Review FBA Google drive edits 6/3/24 from C. Robbins; discuss with Michele M. Dudas	.30	166.80
6/14/24	AS1	Analyze and discuss with Michele M. Dudas re: warehouses (8), marketing content, shorter qual. script, FBAMachine script, clients, ROI	1.20	667.20
6/14/24	AS1	Review motion to extend	.20	111.20



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Date	Atty	Description	Hours	Amount
6/14/24	AS1	Review High Level dec	.20	111.20
6/14/24	AS1	Review BBB complaints on Passive	.30	166.80
6/14/24	AS1	Communicate with Natlaia Efimova Aisler LLC re: support sales operations	.20	111.20
6/14/24	AS1	Review K. Craig email to F. Kern, J. Lahoe, D. Guzman	.20	111.20
6/14/24	AS1	Communicate with S. Rozenfeld; discuss with Michele M. Dudas and Sari B. Placona re: subpoenas; draft email to Usher re: documents required	.50	278.00
6/14/24	AS1	Discuss C. Robbins email with Michele M. Dudas re: Lynn Rojas px137, P. Shah, px9	.40	222.40
6/14/24	AS1	Review M. Genes Testing and ex	.20	111.20
6/14/24	AS1	Analyze amended complaint	.30	166.80
6/14/24	AS1	Communicate with Michele M. Dudas re: Sales Support vendor; communicate with A. Calascibetta re: deposits and transfers in Amanda's account	.30	166.80
6/14/24	AS1	Review and revise Subpoena to Carestia	.50	278.00
6/14/24	MMD	Calls with Amir Hassan, warehouse in California re: status; outline notes and provide status to FTC	.30	132.00
6/14/24	MMD	Confer with Temporary Receiver re: coordinating meeting with M. Usher and S. Rozenfeld to review store processes and customer feedback	.20	88.00
6/14/24	MMD	Review information and recordings provided by M. Gene, former Passive Scaling client	.80	352.00
6/14/24	MMD	Review entered Order adjourning preliminary injunction hearing and extending Temporary Restraining Order; update calendars	.10	44.00
6/14/24	MMD	Calls with F. DiPaolo re: packages at property and actions to be taken	.30	132.00
6/14/24	MMD	E-mail to M. Usher re: June 17, 2024 Teams meeting; coordinate with all parties and Eisner Ampner; review client data provided	.20	88.00
6/14/24	MMD	Request information from Eisner Ampner regarding payments to Amanda, at request of FTC	.10	44.00
6/14/24	MMD	Review Amended Complaint filed against Amanda Peremen Rozenfeld	.30	132.00
6/14/24	MMD	Continue downloading, review and production of Chase bank account information; forward to Eisner Ampner and FTC	1.70	748.00
6/14/24	SBP	Review Declaration of Genes	.30	126.00
6/14/24	SBP	Email with S. Stalvey re: Wegener suit	.10	42.00
6/14/24	SBP	Communicate with M. Kelly re: bond application	.10	42.00
6/14/24	SBP	Review emails to M. Usher re: information	.20	84.00
6/15/24	SBP	Review email from D. Bond re: statements	.20	84.00
6/15/24	SBP	Review amended complaint	.30	126.00
6/15/24	SBP	Review notice of amended complaint	.10	42.00
6/15/24	SBP	Review court order extending TRO	.10	42.00
6/15/24	SBP	Review letter from Wells Fargo re: account	.10	42.00

Date	Atty	Description	Hours	Amount
6/15/24	SBP	Review motion to lift seal	.20	84.00
6/15/24	SBP	Review emails re: defendants' accounts	.20	84.00
6/15/24	SBP	Review documents obtained from Google drive	.30	126.00
6/17/24	MK	Finalized and Filed Temporary Receiver's Bond with the court.	.90	136.80
6/17/24	AS1	Communicate with Michele M. Dudas re: strategy ad operations	.20	111.20
6/17/24	AS1	Review Luke Rotta transcript and email	.20	111.20
6/17/24	AS1	Review Wells letter re: TRO; discuss with Michele M. Dudas and Sari B. Placona	.20	111.20
6/17/24	AS1	Call with S. Rozenfeld, A. Calascibetta, Alex, Michele M. Dudas, and Sari B. Placona re: status and strategy	1.60	889.60
6/17/24	MMD	Participate in conference call with S. Rozenfeld, counsel, A. Sodono and S. Placona re: additional information relating to business	1.90	836.00
6/17/24	MMD	Review Corporate Disclosure prepared by Rozenfeld; review additional information relating to bank accounts and customer contracts; review response of GoHighLevel; forward information to FTC	.50	220.00
6/17/24	MMD	Confer with Temporary Receiver and S. Placona re: conversation with Rozenfeld and actions to be taken	.30	132.00
6/17/24	SBP	Review list of accounts	.10	42.00
6/17/24	SBP	Revise letter to parties serving receiver bond	.10	42.00
6/17/24	SBP	Email with S. Stalvey re: stay of Wegener suit	.10	42.00
6/17/24	SBP	Call with A. Sodono and M. Dudas re: follow up from call with Rozenfeld	.30	126.00
6/17/24	SBP	Review attachment B - background info for Defendants	.10	42.00
6/17/24	SBP	Review attachment A - financials from Rozenfeld	.10	42.00
6/17/24	SBP	Zoom call with A. Sodono, M. Dudas, S. Rozenfeld, and A. Susi re: status of business and assets	1.90	798.00
6/17/24	SBP	Revise subpoena to K. Carestia	.20	84.00
6/18/24	AS1	Communicate with A. Calascibetta re: subpoena	.30	166.80
6/18/24	AS1	Communicate with Michele M. Dudas re: Edgewater rental	.20	111.20
6/18/24	AS1	Review Denny email	.30	166.80
6/18/24	AS1	Communicate with A. Calascibetta re: financials and analysis	.30	166.80
6/18/24	AS1	Communicate with Michele M. Dudas re: O'Neil customer complaint	.20	111.20
6/18/24	MMD	Call with current customer John O'Neill re: information on store and actions to be taken; draft memo re: same	.40	176.00
6/18/24	MMD	Review Financial Statement provided for certain corporate defendants; forward to FTC	.50	220.00
6/18/24	MMD	Confer with Temporary Receiver re: resumption of operations to fulfill orders	.20	88.00
6/18/24	MMD	Call with current customer Shane Philpott re: information relating to store and litigation; draft memo to Temporary Receiver	.50	220.00
6/18/24	SBP	Review financial statement for 3PL	.10	42.00
6/18/24	SBP	Review financial for Daily Distro	.10	42.00



Date	Atty	Description	Hours	Amount
6/18/24	SBP	Review email from K. Denny re: complaint of FBA Machine	.10	42.00
6/18/24	SBP	Review financial statement of Hourly Relief	.10	42.00
6/18/24	SBP	Review FBA Machine financial	.10	42.00
6/18/24	SBP	Revise subpoena to CPA	.10	42.00
6/18/24	SBP	Review Amazon agreements	.20	84.00
6/19/24	AS1	Review Aisler emails re: products	.20	111.20
6/19/24	AS1	Review Sales Support agreement	.20	111.20
6/19/24	AS1	Draft and revise subpoenas; discuss with Sari B. Placona	.50	278.00
6/19/24	AS1	Review financial statement, Sales Support FBA	.20	111.20
6/19/24	MMD	Call with Antonio Caraballo re: status; relay information to Temporary Receiver	.20	88.00
6/19/24	MMD	E-mails from/to counsel to Go High Level re: coordination of call with FTC	.10	44.00
6/19/24	MMD	Outline summary of calls and issues for FTC; discuss with A. Sodono; coordinate status call with FTC	1.20	528.00
6/19/24	MMD	Call with Chris Grego, current FBA customer; draft memo of notes to file	.30	132.00
6/19/24	MMD	Discuss outstanding information from Rozenfeld with Temporary Receiver; draft e-mail to M. Usher re: same	.40	176.00
6/19/24	MMD	Review e-mail from Aisler, Passive Scaling customer, to resume operations; discuss with Temporary Receiver	.20	88.00
6/19/24	SBP	Email FTC re: status of amended complaint	.10	42.00
6/19/24	SBP	Review letter from R. Saldutti re: Passive Scaling	.10	42.00
6/19/24	SBP	Review emails re: Amazon stores and customers	.20	84.00
6/20/24	AS1	Call with Michele M. Dudas, Sari B. Placona, Frank Kern, and Colleen Robbins to discuss findings, evidence, operations, proofs, profits and losses, shipping, etc.	1.10	611.60
6/20/24	AS1	Post call with FTC call with Michele M. Dudas and Sari B. Placona re: continued operations; discuss with F. DiPaolo re: warehouse access and shipments	.50	278.00
6/20/24	AS1	Communicate with F. Kern and C. Robbins re: operations	.20	111.20
6/20/24	AS1	Call with Michele M. Dudas and Sari B. Placona re: operations and overhead	.50	278.00
6/20/24	AS1	Analyze Valiant Consultants Inc. complaint; discuss with Michele M. Dudas	.40	222.40
6/20/24	AS1	Communicate with Michele M. Dudas re: Andrea Urioste and Charlotte White issues	.30	166.80
6/20/24	MMD	Call with A. Sodono and FTC re: continuation of business	1.20	528.00
6/20/24	MMD	Call with Charlotte White and Andrea Urioste; draft memorandum summarizing notes	.40	176.00
6/20/24	SBP	Communicate with receiver about website language for customers	.10	42.00
6/20/24	SBP	Follow up call with A. Sodono and M. Dudas re: status	.20	84.00



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Date	Atty	Description	Hours	Amount
6/20/24	SBP	Call with A. Sodono, M. Dudas and FTC re: status update on operations	1.30	546.00
6/20/24	SBP	Call with receiver and M. Dudas re: status	.20	84.00
6/21/24	MK	Drafted and filed Notices of Appearance for Sari Placona and Michele Dudas	.60	91.20
6/21/24	MK	Drafted and filed Notice of Appearance for Anthony Sodono	.30	45.60
6/21/24	MMD	Call with F. DiPaolo re: resumption of operations and oversight for same	.20	88.00
6/21/24	MMD	Review and revise various versions of e-mail to Rozenfeld and counsel re: operation of business	.60	264.00
6/21/24	MMD	Draft e-mails to current FBA and Passive Scaling customers re: outstanding orders and returns; draft service lists for each entity consisting of approximately 130 e-mail addresses	1.00	440.00
6/21/24	SBP	Call with A. Sodono and A. Calascibetta re: documents	.50	210.00
6/21/24	SLL	Prepare letter to stay action in florida and email chambers	.30	60.00
6/23/24	AS1	Communicate with Michele M. Dudas re: shipping employee, warehouse payment	.40	222.40
6/23/24	AS1	Call with A. Calascibetta re: subpoenas and analysis	.30	166.80
6/23/24	MMD	Call with M. Dominguez (North Bergen employee), A. Sodono and S. Placona re: resuming North Bergen operations, payroll and related issues; follow up calls with A. Sodono and S. Placona	.30	132.00
6/23/24	SBP	Call with A. Sodono and M. Dudas re: status; call with Michele, employee, re: North Bergen facility	.30	126.00
6/24/24	AS1	Communicate with D. Wagner re: Dade County litigation	.20	111.20
6/24/24	AS1	Draft email to Court and order re wind-down of operations, transfer funds; discuss with Michele M. Dudas and Sari B. Placona	.80	444.80
6/24/24	AS1	Communicate with FTC re: financials	.20	111.20
6/24/24	AS1	Communicate with Michelle Dominguez re: working at warehouse	.20	111.20
6/24/24	AS1	Communicate with C. Koo re: status of operations	.20	111.20
6/24/24	AS1	Review C. Robbins emails on T. Stamps complaint; review and discuss with Michele M. Dudas	.30	166.80
6/24/24	AS1	Review Koo complaint	.20	111.20
6/24/24	DP	Telephone call from creditor A. Bhatti; communicate with MSB Team re contact information for Mr. Bhatti	.10	20.00
6/24/24	DP	Prepare and process online application for EIN tax ID number for Temporary Receiver; "Technical Difficulties" message received after applying	.20	40.00
6/24/24	MMD	Various e-mails re: corporate Financial Statements required by Defendants; e-mail to M. Usher re: same	.20	88.00
6/24/24	MMD	Coordinate with M. Dominguez re: reopening of North Bergen property; investigate information relating to shipper identified by M. Dominiguez and provide information to FTC	.40	176.00
6/24/24	MMD	E-mail to FBA customers L. Rotta and C. Koo re: return of inventory and related issues	.20	88.00

Date	Atty	Description	Hours	Amount
6/24/24	MMD	Draft cover letter and proposed Order to Judge Neals re: operation of North Bergen business; various e-mails to/from FTC re: same; finalize for filing	1.60	704.00
6/24/24	MMD	Review information provided by FTC re: call with Ms. Stamps, former employee of Passive Scaling	.20	88.00
6/24/24	SBP	Review proposed letter and order to J. Neals re: operations and pay	.20	84.00
6/24/24	SBP	Court call with Judge Ramsberger re: Florida action v Passive Scaling	.50	210.00
6/24/24	SBP	Email request to M. Usher re: documents	.10	42.00
6/24/24	SBP	Review accountant email of requested documents and PL analysis	.10	42.00
6/24/24	SBP	Call with FTC re: Wegener v Passive Scaling	.20	84.00
6/24/24	SBP	Communicate with D. Wagner re: Miami litigation	.10	42.00
6/24/24	SBP	Review emails re: financials	.20	84.00
6/24/24	SBP	Call to A. Hollander re: status	.20	84.00
6/24/24	SBP	Call with A. Bhatti re: status	.20	84.00
6/24/24	SLL	File letter and proposed order to operate North Bergen facility	.20	40.00
6/25/24	AS1	Review Luke Rotta communication with Michele M. Dudas re: sales support	.20	111.20
6/25/24	DP	Prepare and complete Form SS-4; draft detailed fax cover sheet to IRS re: EIN; arrange for remittance by fax and attach relevant pages of order	.50	100.00
6/25/24	DP	Multiple calls from customers; communicate with MSB Team re: same	.30	60.00
6/25/24	MMD	Call with current FBA customer Vivan Patel; draft memorandum to file	.30	132.00
6/25/24	MMD	Call with current FBA customer William McKinney; draft memorandum to file and notify FTC of background	.30	132.00
6/25/24	MMD	Call with Faigy, Accounting Department, YMB Enterprise re: past due amounts and requirements to continue shipping; draft e-mail to Faigy relating to same	.40	176.00
6/25/24	MMD	Review e-mail from Charlotte and Andrea, Wondering shop (Passive Scaling) customer; respond	.10	44.00
6/25/24	MMD	Call with current FBA customer Rundra Pun; draft memorandum to file and notify FTC regarding new customer not on Defendants' list	.30	132.00
6/25/24	SBP	Zoom call with FTC and S. Scollier re: Wegener stay	.30	126.00
6/25/24	SBP	Email with M. Raff re: subpoena to K. Carestia	.10	42.00
6/25/24	SBP	Call with D. Wagner and FTC re: BA v Passive Scaling	.30	126.00
6/25/24	SBP	Call with M. Dudas re: status of inventory	.10	42.00
6/25/24	SBP	Call with FTC re: Wegener action	.20	84.00
6/25/24	SBP	Review proposed order for Wegener v Passive Scaling	.10	42.00
6/25/24	SBP	Review letter from Amex re: subpoena	.10	42.00
6/26/24	MK	Researched and drafted Pro Hac Vice pleadings in the State of Florida for Sari Placona	1.80	273.60
6/26/24	AS1	Communicate with C. White re: reopening Amazon online store; discuss with Michele M. Dudas	.30	166.80



Date	Atty	Description	Hours	Amount
6/26/24	AS1	Review Vivan Patel complaint; discuss with Michele M. Dudas	.30	166.80
6/26/24	AS1	Communicate with Michele M. Dudas re: Rudra Pun complaints and summary	.20	111.20
6/26/24	AS1	Communicate with Michele M. Dudas re: B. McKinner and Wealth Assistance; discuss relationship with Wealth and Mr. Rozenfeld	.30	166.80
6/26/24	AS1	Communicate with Michele M. Dudas re: Benter Enterprise shipments and operations	.20	111.20
6/26/24	AS1	Communicate with Michele M. Dudas re: pro rata distribution to creditors; discuss D. Wagner and B. Adams comments	.20	111.20
6/26/24	AS1	Communicate with Carestia staff re: production of documents	.20	111.20
6/26/24	AS1	Communicate with Sari B. Placona re: FTC and Florida action, stay	.20	111.20
6/26/24	AS1	Communicate with Michele M. Dudas re: Bruce Gentry re: operations/profits/losses	.20	111.20
6/26/24	AS1	Communicate with Michele M. Dudas re: Go High level and Google communications, passwords	.20	111.20
6/26/24	DP	Telephone call and follow up fax to IRS re: EIN application for Receiver	.40	80.00
6/26/24	MMD	Follow up with M. Usher re: outstanding information relating to businesses; review response	.10	44.00
6/26/24	MMD	Call with F. Kern and C. Robbins re: status and information provided by B. Gentry	.60	264.00
6/26/24	MMD	Calls with F. DiPaolo re: additional packages received at North Bergen property and actions to be taken	.40	176.00
6/26/24	MMD	Call with FBA Customer Michael Crystal re: status	.10	44.00
6/26/24	MMD	Call with Passive Scaling Customer Bruce Gentry; relay information to Temporary Receiver and call with A. Sodono re: same	.70	308.00
6/26/24	SBP	Call with M Dudas and FTC re: FBA offshore account and consumer complaints	.50	210.00
6/27/24	AS1	Multiple calls/emails re: Rozenfeld/Jordana operations in Philippines for one hour; discuss cease and desist	.50	278.00
6/27/24	MMD	Review entered Order authorizing Temporary Receiver to operate North Bergen warehouse; call to Flagstar Bank; call with TD Bank and e-mail to TD; various e-mails to/from YMB Enterprises	.40	176.00
6/27/24	MMD	Call with M. Usher, S. Rozenfeld and S. Placona re: missing information and compliance with TRO	.70	308.00
6/27/24	MMD	Various e-mails with FTC re: login and credential information	.20	88.00
6/27/24	MMD	Calls with F. DiPaolo re: additional packages and storage issues	.20	88.00
6/27/24	SBP	Update call with A. Sodono regarding status	.40	168.00
6/27/24	SBP	Call with M Usher, M Dudas and S Rozenfeld re: status of information	.60	252.00
6/27/24	SBP	Review case law re: federal order over state court action	.30	126.00
6/27/24	SBP	Review and revise pro hac forms for Florida	.20	84.00
6/27/24	SBP	Communicate with M. Usher re: missing documents	.10	42.00



Date	Atty	Description	Hours	Amount
6/27/24	SBP	Review emails and discuss with M. Dudas and Receiver re: emails, status of inventory, etc	.30	126.00
6/28/24	MK	Redacted details from Client Bank Statements	.80	121.60
6/28/24	AS1	Analyze case law staying state court actions; discuss with Michele M. Dudas and Sari B. Placona	.70	389.20
6/28/24	AS1	Communicate with Michele M. Dudas re: change passwords, access to data; discuss fund transfer and Philippine issues	.40	222.40
6/28/24	MMD	Review and analyze Motion for preliminary injunction vs. Amanda Rozenfeld	.30	132.00
6/28/24	MMD	Various e-mails with FTC and Rozenfeld re: access to online accounts	.40	176.00
6/28/24	MMD	Review e-mail from landlord re: past due rent; forward to Temporary Receiver	.10	44.00
6/28/24	MMD	Review e-mail from C. White re: return of inventory for Passive Scaling; respond	.10	44.00
6/28/24	MMD	Call with FBA customer Matthew Metz re: information and background	.10	44.00
6/28/24	MMD	Forward financials produced by S. Rozenfeld to FTC (obtained from Google link sent on June 18, 2024)	.30	132.00
6/28/24	MMD	Respond to counsel to Amazon re: TRO and accounts	.30	132.00
6/28/24	SBP	Review emails from landlord and passcodes required from Rozenfeld	.20	84.00
6/29/24	AS1	Communicate with C. White re: inventory and products in warehouse; discuss with Michele M. Dudas	.30	166.80
6/29/24	AS1	Communicate with Michele M. Dudas re: account balances and email address spreadsheet; communicate with customers	.30	166.80
6/29/24	AS1	Communicate with A. Calascibetta re: reconciliation of accounts; discuss with Sari B. Placona	.40	222.40
6/29/24	AS1	Communicate with Michele M. Dudas re: Jason Ruiz; communicate with J. Ruiz re: account information, fulfilling orders, and process return issues	.30	166.80
6/30/24	AS1	Communicate with Michele M. Dudas re: Google passwords and access; discuss with F. DiPasolo status of inventory and delivery of same	.40	222.40
6/30/24	MMD	Response to A. Patel, FTC re: changing of passwords and level of access for Receivership Entity employees	.10	44.00
6/30/24	MMD	Review e-mail from Temporary Receiver re: immediate payments and actions to be taken	.10	44.00
6/30/24	SBP	Review FTC motion re: briefing schedule	.20	84.00
7/01/24	MMD	Draft letter to Flagstar Bank for service via overnight mail re: release of frozen funds to Temporary Receiver; call with Flagstar Bank and provide copy of Order via e-mail	.30	132.00
7/01/24	MMD	Call with F. DiPaolo and communications with M. Dominguez re: status of North Bergen operations	.20	88.00
7/01/24	MMD	Call with Amazon re: compliance with TRO and related issues (0.4); draft e-mail respecting same	.60	264.00



Date	Atty	Description	Hours	Amount
7/01/24	SBP	Call with amazon and M Dudas re inventory	.40	168.00
7/01/24	SBP	Review motion for preliminary injunction as to Amanda	.10	42.00
7/01/24	SLL	Serve letter to Flagstar	.20	40.00
7/02/24	AS1	Communicate with Michele M. Dudas re Brian Skuja sales, Rozenfeld operations	.30	166.80
7/02/24	AS1	Call with F. DiPaolo re storage, removal of inventory, securing same	.40	222.40
7/02/24	AS1	Communicate with Michele M. Dudas and Faigy Ackerman of YMB Enterprises re shipping	.20	111.20
7/02/24	AS1	Communicate with Michele M. Dudas re landlord self-help, cease and desist issues	.30	166.80
7/02/24	AS1	Communicate with J. Ruiz re Amazon account, audit with Michele M. Dudas	.30	166.80
7/02/24	AS1	Communicate with Michele M. Dudas re GHL access internet	.20	111.20
7/02/24	AS1	Communicate with M. Fackrel re Passive claims	.20	111.20
7/02/24	AS1	Call with M. Schlant re potential settlement	.20	111.20
7/02/24	AS1	Review application for injunctive and other relief and memorandum of law; discuss with Michele M. Dudas	.60	333.60
7/02/24	MMD	Call with R. Sfeir, Passive Scaling customer re: lawsuit; draft memorandum to Receiver re: same	.40	176.00
7/02/24	MMD	Respond to landlord re: threat to throw out items at North Bergen property	.20	88.00
7/02/24	MMD	Review information from FTC re: ongoing violations of TRO by Defendants; review post-TRO communications and calls by S. Rozenfeld and salespeople	.90	396.00
7/02/24	SBP	Email M Raff re status of documents from accountant	.10	42.00
7/02/24	SBP	Review inventory and breakdown email from Eisner	.20	84.00
7/03/24	AS1	Communicate with Michele M. Dudas and M. Schlant, landlord's counsel, re North Bergen	.30	166.80
7/03/24	MMD	Review e-mail from landlord re: lease information; review Leases and respond	.20	88.00
7/03/24	MMD	Calls with Flagstar Bank re: turnover of frozen funds; respond	.20	88.00
7/03/24	SBP	Communicate with FTC re operations	.10	42.00
7/05/24	MMD	Review issues relating to OGAMZPL21 and research bringing asset into receivership entity; discuss with A. Sodono	1.70	748.00
7/08/24	AS1	Zoom with F. Kern, Michele M. Dudas and Sari B. Placona re status and failure by Defendants to produce documents	.60	333.60
7/08/24	AS1	Communicate with Michele M. Dudas and Sari B. Placona re Flagstar and TD Bank deposits	.30	166.80
7/08/24	AS1	Call with Michele M. Dudas, Sari B. Placona, T. Friou, A. Calascibetta, and S. Crouton re financials, books and records, fraudulent conveyances/preference analysis	.80	444.80
7/08/24	DP	Follow-up fax to IRS re status of issuance of Receiver's EIN	.20	40.00



Date	Atty	Description	Hours	Amount
7/08/24	IDF	Edit motion to stay case.	3.20	640.00
7/08/24	MMD	Calls with M. Dominguez, North Bergen employee re: return to work; discuss with Receiver; e-mails to/from shipper (YMB) re: resuming services	.30	132.00
7/08/24	MMD	Review e-mail from S. Philpotts re: return of monies and status; respond	.10	44.00
7/08/24	MMD	Call with A. Sodono and S. Placona re: status, strategy, and actions to be taken	.30	132.00
7/08/24	MMD	Call with Levy Department, TD Bank re: release of levy and issuance of check to Receiver; confirm receipt of Flagstar check	.40	176.00
7/08/24	MMD	Follow up with M. Usher, counsel to Defendants re: outstanding information	.10	44.00
7/08/24	MMD	Call with representatives of Eisner Ampner, A. Sodono and S. Placona re: additional financial information needed to complete analysis and request for call with Rozenfeld to obtain additional information	.80	352.00
7/08/24	MMD	Call with F. Kern, A. Sodono and S. Placona re: status and issues relating to Rozenfeld contempt; request additional information for assets potentially to be brought into receivership estate	.80	352.00
7/08/24	MMD	Review deficiency notice issues by FTC to Defendants	.10	44.00
7/08/24	SBP	Email with M Raff re status of documents	.10	42.00
7/08/24	SBP	Zoom call with M Dudas, F Kern and A Sodono re status	.80	336.00
7/08/24	SBP	Call with Eisner and M Dudas re books and records	.70	294.00
7/08/24	SBP	Call with A Sodono and M Dudas re status	.20	84.00
7/09/24	AS1	Communicate with Michele M. Dudas and Sari B. Placona re Art Hollander inventory	.20	111.20
7/09/24	AS1	Communicate with Philpotts re status and claims	.20	111.20
7/09/24	AS1	Communicate with A. Hollander re open balance and inventory	.30	166.80
7/09/24	IDF	Review Motion to stay litigation draft, consulted assoc. to confirm proper formatting, make final edits, read and annotate cases from supervising atty to insert into motion, add cases to draft.	4.10	820.00
7/09/24	MMD	Various calls and e-mails with F. DiPaolo, Michelle Dominguez and customers re: e-mail to customers and changing start date from July 11, 2024 until July 15, 2024	1.60	704.00
7/09/24	SBP	Email A Hollander re inventory	.10	42.00
7/09/24	SBP	Revise motion to stay Wegner litigation	.20	84.00
7/09/24	SBP	Call with Shane re inventory	.10	42.00
7/10/24	AS1	Analyze Greco claim	.20	111.20
7/10/24	AS1	Analyze Rowzel claim	.20	111.20
7/10/24	AS1	Communicate with Michele M. Dudas re Sudhanso claims	.20	111.20
7/10/24	AS1	Communicate with Koo and Michele M. Dudas re Passive claims	.20	111.20
7/10/24	AS1	Communicate with Applewhite re FBAMachine claims	.20	111.20
7/10/24	AS1	Analyze Hollander claims	.20	111.20



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Date	Atty	Description	Hours	Amount
7/10/24	AS1	Analyze Bond claims	.20	111.20
7/10/24	AS1	Analyze Holley claim	.20	111.20
7/10/24	AS1	Review ECO Household claims	.20	111.20
7/10/24	AS1	Communicate with Tym Trucking re shipping issue and costs; discuss with Sari B. Placona	.20	111.20
7/10/24	AS1	Analyze Macumber claims	.20	111.20
7/10/24	AS1	Analyze Irwin Property Retail	.20	111.20
7/10/24	AS1	Communicate with Emilio Lugo	.20	111.20
7/10/24	DP	Communicate with Sari B. Placona re Receiver's EIN not yet issued by IRS	.10	20.00
7/10/24	MMD	Obtain financial records from Chase; review and download to system	.80	352.00
7/10/24	MMD	Various e-mails and calls re: further violation of TRO; discuss with A. Sodono	.50	220.00
7/10/24	MMD	Call with various customers re: resumption of fulfillment of orders and related information regarding TRO	1.00	440.00
7/10/24	MMD	Call with customer Gertrudis Hernandez re: dissatisfaction with services and issues relating to store	.40	176.00
7/10/24	MMD	Coordinate with former employees (independent contractors) re: resumption of fulfilling existing orders; calls with F. DiPaolo	.70	308.00
7/10/24	MMD	Draft e-mail to M. Usher re: July 11 call	.10	44.00
7/10/24	MMD	Call with David Honigsman, Flagstar Bank re: credit status of account	.10	44.00
7/10/24	SBP	Email G Hellerman re EIN number	.10	42.00
7/10/24	SBP	Review emails from customers re inventory	.30	126.00
7/11/24	AS1	Review F. Kern email re contacting customers and continued business operations summary	.20	111.20
7/11/24	AS1	Analyze Puh claims	.20	111.20
7/11/24	AS1	Analyze J. Platta claims	.20	111.20
7/11/24	AS1	Analyze D. Johns claims	.20	111.20
7/11/24	AS1	Analyze A. Haq claims	.20	111.20
7/11/24	AS1	Analyze R. Kidd claims	.20	111.20
7/11/24	AS1	Analyze N. Gathungo claims	.20	111.20
7/11/24	AS1	Analyze P. Altjumar claims	.20	111.20
7/11/24	AS1	Communicate with Michele M. Dudas to discuss numerous customer complaints, operations issues	.50	278.00
7/11/24	AS1	Analyze motion to stay actions and discuss with Sari B. Placona, Wegener claims	.70	389.20
7/11/24	DP	Multiple calls from creditors/vendors; communicate with Anthony Sodono, III, and Michele M. Dudas	.20	40.00
7/11/24	MMD	Confer with A. Sodono re: whether to file motion for contempt and intended actions vs. Rozenfeld	.40	176.00
7/11/24	MMD	Review e-mails from F. Kern to M. Usher re: violation of TRO	.10	44.00



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Date	Atty	Description	Hours	Amount
7/11/24	MMD	Call with F. Kern, A. Sodono and S. Placona re: Rozenfeld continued violations of TRO	.40	176.00
7/11/24	MMD	Respond to various customer inquiries based upon notice issued for return of inventory	.80	352.00
7/11/24	MMD	Reinstate Google accounts; call with R. Kaplan, FTC re: same; e-mails re: access to various other accounts	.70	308.00
7/11/24	MMD	Obtain 1HR Delivery bank information produced by Chase for 2024 and review same	.60	264.00
7/11/24	SBP	Call with FTC, A Sodono, and M Dudas re compliance with TRO	.40	168.00
7/11/24	SBP	Email M Raff re response to subpoena	.10	42.00
7/11/24	SBP	Revise joint stay motion as to Wegener	.20	84.00
7/12/24	AS1	Analyze J. Blackman claims	.20	111.20
7/12/24	AS1	Communicate with Sari B. Placona and Accountant re turnover of financial documents	.30	166.80
7/12/24	AS1	Review communications with FTC and Usher re production of documents	.20	111.20
7/12/24	AS1	Analyze Retail Depot claims	.20	111.20
7/12/24	AS1	Communicate with Bill Rust re claims	.20	111.20
7/12/24	AS1	Analyze Burke claims	.20	111.20
7/12/24	AS1	Call with F. Kern, Michele M. Dudas, and Sari B. Placona re various litigation issues, financial information	.70	389.20
7/12/24	DP	Communicate with Anthony Sodono, III and Michele M. Dudas re checks for employee wages; communicate with Finance Dept. and prepare check requests (8)	.30	60.00
7/12/24	MMD	Call with F. Kern, A. Sodono and S. Placona re: Defendants' violation of TRO	.60	264.00
7/12/24	MMD	Various calls and e-mails with Michelle Dominguez, Fulvio DiPaolo and Temporary Receiver re: resumption of warehouse fulfillment on July 15, 2024	1.40	616.00
7/12/24	MMD	Respond to various e-mails from customers re: fulfillment of orders and related issues	.60	264.00
7/12/24	SBP	Email M Raff re documents due from accountant	.10	42.00
7/12/24	SBP	Email with S Stalvey re joint motion	.10	42.00
7/12/24	SBP	Zoom call with F Kern, A Sodono, and M Dudas re status and report	.60	252.00
7/12/24	SBP	Call with K Carestia re document production	.20	84.00
7/14/24	MMD	Compile list of Passive Scaling and FBA customers requesting return of inventory and inventory lists; draft e-mail to M Dominguez re: same	.80	352.00
7/14/24	MMD	E-mail from M. Dominguez re: lockout of warehouse e-mail; e-mail to R. Kaplan, FTC re: same; call with F. Kaplan and reinstate accounts; e-mail to M. Dominguez re: same	.50	220.00
7/15/24	AS1	Communicate with Michele M. Dudas re Passive FBA inventory priority and discuss AA facility and clear out	.50	278.00
7/15/24	AS1	Analyze Magnolia Ent. claims	.20	111.20



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Date	Atty	Description	Hours	Amount
7/15/24	AS1	Communicate with Michele M. Dudas re alleged Google issues	.20	111.20
7/15/24	AS1	Communicate with F. DiPaolo, M. Dominguez, and H. Byrnes re shipments and sales	.50	278.00
7/15/24	AS1	Analyze Ramco Spec. claims	.20	111.20
7/15/24	DP	Communicate with Anthony Sodono, III and Michele M. Dudas re additional back-pay checks for 7 employees; prepare check requests and communicate with Finance Dept.	.30	60.00
7/15/24	DP	Communicate with Michele M. Dudas re wire to YMB Enterprises; review invoice and wire instructions; prepare Wire Transfer Form and communicate with Finance Dept.	.20	40.00
7/15/24	MMD	Review e-mail from F. Kern re: Infotel BPO interference with business; discuss with Temporary Receiver and respond to e-mail	.20	88.00
7/15/24	MMD	Field various calls and e-mails from existing customers re: status of business	.80	352.00
7/15/24	MMD	Calls, e-mails and text messages with M. Dominguez re: resumption of services at North Bergen warehouse; coordinate with F. DiPaolo and A. Sodono; request ARN information from 12 orders ready for fulfillment; coordinate with YMB for payment of past due amounts and shipping information	2.40	1,056.00
7/15/24	SLL	Email to local counsel in Florida re filing motion to stay proceeding	.20	40.00
7/16/24	AS1	Travel to/from warehouse in N. Bergen, NJ	1.30	722.80
7/16/24	AS1	Meeting and inspection of warehouse	1.20	667.20
7/16/24	AS1	Analyze Irwin claims	.20	111.20
7/16/24	AS1	Analyze Shivers claims	.20	111.20
7/16/24	AS1	Analyze YMB Enterprise claims	.20	111.20
7/16/24	AS1	Analyze Aisler/Paolo claims	.20	111.20
7/16/24	AS1	Analyze Ashan Haq claims	.20	111.20
7/16/24	AS1	Analyze M. Hampton claims	.20	111.20
7/16/24	AS1	Communicate with Michele M. Dudas re customer lists and dba BPO	.20	111.20
7/16/24	AS1	Communicate with Michele M. Dudas re turnover of funds from TD Bank	.20	111.20
7/16/24	MMD	Various e-mails with customers re: inventory and related information	.40	176.00
7/16/24	MMD	E-mail to J. Schwartz re: request to be excused from mediation based upon failure of counsel to Defendant to respond	.20	88.00
7/16/24	MMD	Call with F. Kern, C. Robbins, A. Sodono and S. Placona re: status	.70	308.00
7/16/24	MMD	Various e-mails and calls re: North Bergen operations, including with F. DiPaolo, A. Sodono and M. Dominguez	.70	308.00
7/16/24	SBP	Call with FTC, A Sodono, and M Dudas re status	.60	252.00
7/16/24	SBP	Revise order granting stay motion in Wegener litigation	.10	42.00
7/16/24	SLL	Prepare order and letter to Judge in florida re stay motion; telephone call with local counsel	.20	40.00
7/17/24	AS1	Analyze claims of Serrano	.20	111.20



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Date	Atty	Description	Hours	Amount
7/17/24	AS1	Analyze claims of V. Patel	.20	111.20
7/17/24	AS1	Analyze claims of Hasler	.20	111.20
7/17/24	AS1	Analyze claims of Myers	.20	111.20
7/17/24	AS1	Analyze claims of Second	.20	111.20
7/17/24	AS1	Analyze claims of McKinney	.20	111.20
7/17/24	AS1	Analyze claims of Calkowsky	.20	111.20
7/17/24	AS1	Analyze claims of Gentry	.20	111.20
7/17/24	AS1	Analyze claims of Natalya	.20	111.20
7/17/24	AS1	Analyze claims of Mendolovic	.20	111.20
7/17/24	AS1	Analyze claims of Verduggo	.20	111.20
7/17/24	AS1	Analyze claims of Sandi	.20	111.20
7/17/24	AS1	Zoom call with Michele M. Dudas, Sari B. Placona, Fran Kern, and C. Robbins re various issues, hearing, claims	.70	389.20
7/17/24	DP	Follow-up faxes (2) to IRS re issuance of Receiver's EIN; communicate with Anthony Sodono, III and Michele M. Dudas re same	.30	60.00
7/17/24	MMD	Follow up call with TD Bank re: release of frozen funds due on July 1, 2024	.30	132.00
7/17/24	MMD	Various e-mails relating to Zoeller Pump past due amounts; investigate claims; draft e-mail to FTC and Temporary Receiver re: findings and issues relating to non-payment and customer claims	.50	220.00
7/17/24	MMD	Call with M. Dominguez re: operations at North Bergen; review information provided regarding returns and inventory with FTC; discuss with Temporary Receiver; outline memo regarding issues relating to same	1.20	528.00
7/17/24	MMD	Call with Janice Hollins, FBA customer re: background; draft memorandum to file regarding conversation	.20	88.00
7/17/24	MMD	Call with William Amant, Passive Scaling customer, re: status and background information; draft memo to Temporary Receiver regarding conversation	.40	176.00
7/17/24	MMD	Call with Jodie Hollinrake re: Passive Scaling background; draft memorandum to Temporary Receiver re: same	.40	176.00
7/17/24	MMD	Various e-mails with A. Hollander re: Illinois warehouse; review information provided and discuss next steps with Temporary Receiver	.20	88.00
7/17/24	SBP	Email with A Hollander re status	.10	42.00
7/18/24	AS1	Analyze claims of Ruiz, Sajeri, Ward, Ashish, Krisna, Attrah, Hassan, Exume, Grego a Proceh	.50	278.00
7/18/24	AS1	Communicate with J. Macomber and seller contracts	.20	111.20
7/18/24	AS1	Call with Michele M. Dudas re strategy and report, claims	.50	278.00
7/18/24	MMD	Call with TD Bank re: release of levy	.30	132.00
7/18/24	MMD	Review Intuit information and forward to Eisner Ampner	.50	220.00
7/18/24	MMD	Call with F. DiPaolo re: warehouse and employee issues	.20	88.00



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Date	Atty	Description	Hours	Amount
7/18/24	MMD	Call with A. Sodono re: actions to be taken with inventory, returns and against Rozenfeld; draft e-mail to M. Usher demanding turnover of cell phone	.60	264.00
7/18/24	MMD	Call with F. Kern and C. Robbins re: additional violations with TRO; review recordings produced	.50	220.00
7/18/24	MMD	Review e-mail from A. Calsciabetta re: call with Defendants' counsel and principal; respond	.10	44.00
7/18/24	SBP	Review emails re warehouse and deliveries	.20	84.00
7/19/24	AS1	Communicate with Michele M. Dudas re Dominguez and shipping issues, Rozenfeld	.20	111.20
7/19/24	AS1	Communicate with Michele M. Dudas re business report and Experian Ovation claims	.70	389.20
7/19/24	AS1	Analyze Retail Depot claims	.20	111.20
7/19/24	AS1	Communicate with Michele M. Dudas re Intuit documents	.20	111.20
7/19/24	AS1	Communicate with Michele M. Dudas re phone and turnover issues	.30	166.80
7/19/24	AS1	Analyze Distro, Curnet, Zoelle issues	.20	111.20
7/19/24	AS1	Analyze Wouldering Grood claim	.20	111.20
7/19/24	MMD	Review e-mail from TD Bank; respond	.20	88.00
7/22/24	AS1	Communicate with Michele M. Dudas re landlord payments and shipping issue	.30	166.80
7/22/24	AS1	Analyze Irwin claims	.20	111.20
7/22/24	AS1	Analyze C. Grego claims	.20	111.20
7/22/24	AS1	Analyze Serrano claims	.20	111.20
7/22/24	AS1	Analyze V. Patel claims	.20	111.20
7/22/24	AS1	Analyze K. Rita claims	.20	111.20
7/22/24	DP	Communicate with Michele M. Dudas re employee (contractor) pay for w/o 7/15/2024; prepare check requests and communicate with Finance Dept.	.30	60.00
7/22/24	MMD	E-mail and call with Vivan Patel re: status and return of investment	.40	176.00
7/22/24	MMD	Calls with F. DiPaolo and H. Byrnes re: removal of returns to new location and eventual auction	.30	132.00
7/22/24	MMD	Calculate independent contractor wages and coordination of payment	.50	220.00
7/22/24	MMD	Draft letter to M. Dominguez re: status of employment and Amazon store information; forward to Temporary Receiver with information	.30	132.00
7/22/24	MMD	E-mails to/from various customers re: POs/invoices for shipment of inventory; forward information to M. Dominguez	.30	132.00
7/22/24	SBP	Communicate with S Stalvey re pre trial	.10	42.00
7/22/24	SBP	Review emails re amazon returns	.20	84.00
7/23/24	AS1	Analyze Pun claims	.20	111.20
7/23/24	AS1	Review letter from M. Dominguez re inventory and shipping issues	.20	111.20



Date	Atty	Description	Hours	Amount
7/23/24	MMD	Various calls with F. DiPaolo, H. Byrnes (AJ Willner) and M. Dominguez re: returns and inventory contained in North Bergen warehouse	.90	396.00
7/23/24	MMD	E-mails with various customers re: return of inventory	.20	88.00
7/23/24	MMD	Begin review filing of FTC re: July 30 hearing; review audio attachments	1.40	616.00
7/23/24	MMD	Continue outlining/draft Receiver's Report; discuss with A. Sodono	3.60	1,584.00
7/24/24	MK	Began to draft pleadings for Fee Application	.30	45.60
7/24/24	AS1	Analyze N. Gathungo claims	.20	111.20
7/24/24	AS1	Analyze J. Burnett claims	.20	111.20
7/24/24	AS1	Communicate with F. Kern re audio/video files; analyze same; discuss with Michele M. Dudas	.60	333.60
7/24/24	AS1	Analyze Zoeller Pump issues; discuss with Michele M. Dudas	.20	111.20
7/24/24	AS1	Communicate with Michele M. Dudas re Copecart and N. Gathungo claims	.50	278.00
7/24/24	MMD	Review information provided by counsel N. Gathungru; forward information relating to unknown entity to counsel to FTC; respond	.40	176.00
7/24/24	MMD	Communicate with M. Dominguez and counsel to Zoeller re: return of pumps; various e-mails to/from counsel to Zoeller re: same and discuss with Temporary Receiver	.80	352.00
7/24/24	MMD	Various e-mails to/from M. Dominguez and customers for return of inventory in North Bergen	.20	88.00
7/24/24	MMD	Call with TD Bank re: return of levied funds and threat to find them in contempt	.30	132.00
7/24/24	MMD	Call with F. Kern, FTC re: July 30 hearing	.20	88.00
7/24/24	MMD	Finalize review of July 23, 2024 supplemental filing by FTC and summarize for Temporary Receiver	1.00	440.00
7/24/24	SBP	Review FTC supplemental filings for PI hearing	.30	126.00
7/24/24	SBP	Status call with A Sodono and M Dudas	.40	168.00
7/25/24	MK	Drafting Application for Fees of Counsel and Accountants of Receiver.	1.00	152.00
7/25/24	AS1	Review credit application (21 m); discuss with Michele M. Dudas	.30	166.80
7/25/24	DP	Communicate with Michele M. Dudas and prepare and process changes of address (10)	1.10	220.00
7/25/24	JDS	Drafted cover letter, subpoena, and Exhibit A to subpoena. Researched CopeCart company for relevant information.	1.80	432.00
7/25/24	MMD	Continue reviewing file and drafting Temporary Receiver Report	4.20	1,848.00
7/25/24	MMD	Call with F. Kern, FTC re: July 30 hearing; review letter on docket regarding hearing and Rozenfeld position; discuss with A. Sodono	.50	220.00
7/26/24	MMD	Various calls regarding Nov-ell re: attempt to reclaim Thrift inventory; call with D. Dominguez, F. DiPaolo, H. Byrnes, Kevin Gordon (Nov-ell) and Temporary Receiver re: same; outline memo to file	.50	220.00
7/26/24	MMD	Call with Tom Friou, Eisner Ampner re: July 30 hearing; discuss with Temporary Receiver and e-mail re: same	.30	132.00
7/26/24	MMD	Continue preparing Temporary Receiver's Report	4.60	2,024.00



Date	Atty	Description	Hours	Amount
7/26/24	SBP	Communicate with IRS re EIN number for receiver account	.10	42.00
7/26/24	SBP	Prepare section for report for Florida action	.20	84.00
7/26/24	SBP	Review joint status letter	.10	42.00
7/27/24	MMD	Revise Temporary Receiver Report; forward to Temporary Receiver for review and incorporate all comments; compile exhibits	3.20	1,408.00
7/28/24	AS1	Work on, draft, and revise status report; multiple discussions with Michele M. Dudas	3.80	2,112.80
7/28/24	DP	Review and revise Temporary Receiver's Status Report; communicate with Anthony Sodono, III, and Michele M. Dudas	3.10	620.00
7/28/24	MMD	Finalize, file and serve Temporary Receiver's Report	1.30	572.00
7/28/24	MMD	Review pleadings filed by new counsel to A. Rozenfeld	.20	88.00
7/28/24	SBP	Review FTC letter re adjournment request	.10	42.00
7/29/24	AS1	Analyze Caraballo claims	.20	111.20
7/29/24	AS1	Communicate with Usher re information to be produced	.20	111.20
7/29/24	AS1	Analyze D. Maria claims	.20	111.20
7/29/24	DP	Review and update file with Notices of Appearance on behalf of Amanda Rozenfeld; revise Service List and labels to include	.20	40.00
7/29/24	DP	Communicate with Michele M. Dudas re pay to independent contractors for w/o 7/22/2024; prepare check requests (7) and coordinate with Finance Dept. for issuance of checks	.30	60.00
7/29/24	MMD	E-mail to M. Usher re: accepting service of additional Receivership Entities; review response; respond further regarding outstanding financials and production of cell phone	.40	176.00
7/29/24	MMD	Prepare for July 30, 2024 Preliminary Injunction hearing; discuss issues with Temporary Receiver	2.20	968.00
7/29/24	MMD	Coordinate payroll for North Bergen contractors; coordinate pickup of checks with F. DiPaolo	.30	132.00
7/29/24	MMD	Call with M. Dominguez re: inventory of Receivership Entities; discuss with Temporary Receiver	.30	132.00
7/30/24	MK	Reviewed invoice and drafted documents for First Fee Application of MSB and Eisner.	2.20	334.40
7/30/24	DP	Revise Form SS-4 per IRS and re-submit via fax	.20	40.00
7/30/24	MMD	Various calls and communications with F. DiPaolo, H. Byrnes (AJ Willner) and M. Dominguez re: clearing out North Bergen warehouse	.80	352.00
7/30/24	MMD	Revise and finalize Subpoena and cover letter to Cope America (CopeCart)	.60	264.00
7/30/24	MMD	E-mails to/from landlord of North Bergen property re: demand for rent and status	.20	88.00
7/30/24	MMD	Review communication from counsel to FTC re: hearing date; consult with Temporary Receiver	.10	44.00
7/31/24	DP	Telephone call from and follow-up email to R. Pun re claim	.20	40.00

Date	Atty	Description	Hours	Amount
7/31/24	MMD	Call with FBA Customer Vivan Patel and forward TRO and information relating to stay of litigation; respond to e-mails of other customers re: status	.40	176.00
7/31/24	MMD	Review response of Usher re: turnover of phone; discuss with Temporary Receiver	.20	88.00
7/31/24	MMD	Call with F. DiPaolo re: North Bergen employee issues and status of cleanout	.20	88.00
7/31/24	SLL	Email process server to serve subpoena to Cope Americas	.20	40.00

TOTAL PROFESSIONAL SERVICES

\$ 148,624.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
FISHER, ISABELLA	14.40	200.00	2,880.00
ANTHONY SODONO, III	115.90	556.00	64,440.40
MICHELE M. DUDAS	132.60	440.00	58,344.00
JOHN STERN	1.80	240.00	432.00
SARI PLACONA	42.30	420.00	17,766.00
MATTHEW KELLY	14.00	152.00	2,128.00
BERNADETTE B. CHILLEMI	1.80	152.00	273.60
DIANE PERROTTA	9.90	200.00	1,980.00
STACY LIPSTEIN	1.90	200.00	380.00
Total	334.60		\$ 148,624.00

DISBURSEMENTS

Description	Amount
Travel/Parking Expenses	40.20
Postage	368.69
Filing Fee	103.50
Filing Fee	250.00
Overnight Express Mail	145.21
Westlaw	23.06
Travel/Parking Expenses	1,357.25
Miscellaneous	11.00
BUSINESS RECORDS SERVICE	6.25
Inside Duplicating	556.00
PACER	54.10

TOTAL DISBURSEMENTS **\$ 2,915.26**

TOTAL THIS INVOICE **\$ 151,539.26**